

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TRINITAS MARITIME CARRIERS,

Plaintiff,

-against-

CSN CAYMAN LTD.,

Defendant.

AFFIDAVIT IN SUPPORT
OF PRAYER FOR MARITIME
ATTACHMENT AND
GARNISHMENT

STATE OF NEW YORK :
 : SS.:
COUNTY OF NEW YORK :

JUDGE LEISURE

EDWARD A. KEANE, being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable court and a partner with the firm of MAHONEY & KEANE, LLP, attorneys for plaintiff herein. I am familiar with the circumstances of the Complaint filed in this action and the underlying cause of action.

2. I make this Affidavit in support of plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure [hereinafter "Rule B"].

3. I have made an investigation and am informed and believe based upon the results of this investigation, that the defendant, CSN CAYMAN LTD., is a foreign corporation or other foreign business entity which cannot be "found" within the district for the purposes of an attachment under Rule B. In support of this position, deponent has conducted the following investigation.

4. I have contacted the office of the Secretary of State, Division of Corporations on September 20, 2006, through its information data base and there was no current listing for defendant CSN CAYMAN LTD. or any similarly named corporation.

5. I have reviewed the current telephone directories, and also consulted with Directory Assistance for the areas over which this District, the United States District Court for the Southern District of New York , has jurisdiction, specifically New York (Manhattan) Borough, Bronx Borough, Dutchess, Westchester, Rockland, Sullivan, Orange, and Putnam Counties:

(a) No listing for defendant CSN CAYMAN LTD. was found, nor was any listing for a similarly named corporation found;

(b) Deponent is unaware of any general or managing agent within the Southern District of New York for CSN CAYMAN LTD.;

(c) No papers held by plaintiff, and reviewed by this deponent indicate any presence of CSN CAYMAN LTD. in or around the New York City area;

(d) A search of the internet, or world wide web, using search engines Google and Yahoo failed to demonstrate any presence of CSN CAYMAN LTD. in or about the New York City area.

6. Based upon the foregoing, your deponent submits that the defendant CSN CAYMAN LTD. cannot be "found" within this district for the purpose of an attachment or garnishment under Rule B.

7. I submit that the defendant cannot be found within this District within the meaning of Rule B including, inter alia, the continuous or systematic conduct of business in this district.

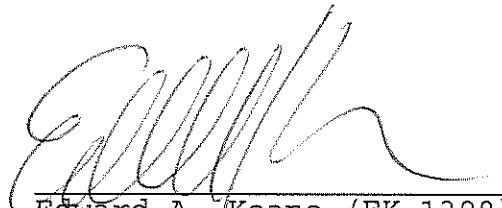
8. Upon information and belief, the defendant has or will have during the pendency of this action, tangible and intangible property within the District in the hands of American Express Bank, Bank of America, Bank of New York, Citibank, HSBC Bank USA Bank, J.P.Morgan Chase, Standard Chartered Bank, and Wachovia Bank N.A.

9. The reason plaintiff is moving for order of attachment rather than regular motion is the urgency of this matter.

10. No application for this or similar relief has been sought in this district.

WHEREFORE, the plaintiff respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of defendant's tangible and intangible property within this district, including, inter alia, such property in the hands of American Express Bank, Bank of America, Bank of New York, Citibank, HSBC Bank USA Bank, J.P.Morgan Chase, Standard Chartered Bank, and Wachovia Bank N.A.

Dated: New York, New York
September 20, 2006


Edward A. Keane (EK 1398)

Sworn to before me this
20th day of September, 2006


Notary Public

GARTH S. WOLFSON
NOTARY PUBLIC
State of New York No. 02WO5078941
Qualified in New York County
Term Expires 04-28-07